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FEDERAL ELECTION
COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

2003 NOV 28 P 3:09

Michael Mass

MUR 4818

GENERAL COUNSEL'S REPORT #11

SENSITIVE**I. ACTIONS RECOMMENDED**

Accept the attached conciliation agreement.

II. BACKGROUND

MUR 4818 arose from a complaint alleging that Walt Roberts and Walt Roberts for Congress (the "Committee") knowingly and willfully violated 2 U.S.C. § 441a(f). Through this Office's investigation, we discovered that Gene Stipe was at the center of multiple schemes that transferred funds from Stipe into the Committee, while hiding Stipe as the true source of the contributions. One scheme included recruiting intermediaries, such as Michael Mass, to whom Stipe gave thousands of dollars. Mass then funneled Stipe's money to straw contributors so as to make the contributions appear as if they were legitimate.

On October 9, 2003, the Commission found reason to believe that Michael Mass knowingly and willfully violated 2 U.S.C. § 441f by assisting Stipe in making contributions in the name of another and entered pre-probable cause conciliation.¹

III. DISCUSSION

¹ The Commission also entered both pre-probable cause conciliation and probable cause conciliation with several other respondents. Those negotiations are ongoing.

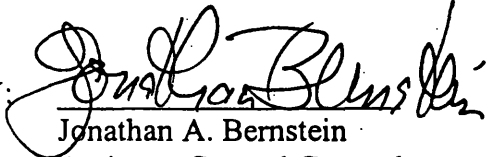
IV. RECOMMENDATIONS

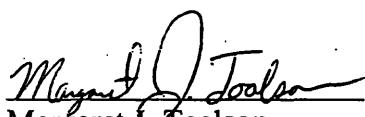
1. Accept the attached conciliation agreement with Michael Mass.
2. Close the file as to Michael Mass.
3. Approve the appropriate letter.

Lawrence H. Norton
General Counsel

Rhonda J. Vosdingh
Associate General Counsel
for Enforcement

BY:


Jonathan A. Bernstein
Assistant General Counsel


Margaret J. Toalson
Attorney


Daniel G. Pinegar
Attorney

Attachment:

1. Conciliation Agreement and Check